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March 20th, 2020

The Honorable Katherine Polk Failla
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square - Courtroom 618
New York, New York 10007

Re: Antolin vs. N Corporation et al
Case No.: 1:19-cv-07385 KPF

Dear Judge Failla,

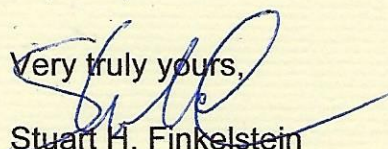
To remind your Honor, I represent Plaintiff Dino Antolini in the above referenced case. Incredibly, I am again placed in the position to write to the Court that defendants are disobeying yet another one of your Orders in this lawsuit. [Docket Entries 20, 25, 28, 33, 35] As such we seek permission to strike defendants pleadings in whole, and for any other relief the Court deems just and proper.

Pursuant to your Order of March 4, 2020 [DE 36], defendants had until March 18, 2020 to respond to Plaintiff's discovery requests. We received nothing from them.

Because of the ongoing health crisis, I gave defendants extra time, but as they say 'no good deed goes unpunished'. When I spoke to defense counsel late this afternoon, he gave me three different reasons why he hasn't complied. First, he said he had until March 27, 2020, secondly, he said "I will try" and third he said "All cases and their orders are postponed". I politely asked him he could refer me to that order and he didn't respond.

Adding salt to the injury, defendants actually had the temerity to send us "Defendants 2nd Set of Interrogatory & Document Production Request on March 12, 2020, in direct contravention of your Order of March 4, 2020 [36].

Very truly yours,


Stuart H. Finkelstein

SHF/tc